



April 1, 2020

Via ECF only

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 1305
New York, New York 10007
EngelmayerNYSDCChambers@nysd.uscourts.gov

Re: Roc Nation LLC v. HCC International Insurance Company, PLC
Venue: US District Court - Southern District of New York
Case No.: 1:19-cv-00554-PAE

Dear Judge Engelmayer:

This firm is legal counsel to Houston Casualty Company (“HCC”), improperly pled as HCC International Insurance Company, PLC, regarding the above-referenced matter. We write to request permission, pursuant to § 4.B of Your Honor’s individual rules and practices, to file the following documents under seal in their totality, which are in response to the letter of Roc Nation LLC regarding its intention to bring a motion to compel HCC to search for and produce documents responsive to Plaintiff’s Requests 1-6 and 8 (Document No. 97): HCC’s Response to Roc Nation’s letter-motion, and a portion of the transcript of the July 11, 2019 Hearing marked as Exhibit A. In accordance with Your Honor’s instructions, the documents have been uploaded via ECF (Document No. 104) with a limited viewing level restricting viewing to selected parties, as we await Your Honor’s review of these documents and decision.

Defendant seeks to file the aforementioned documents under seal as they contain sensitive and confidential information pertaining to Plaintiff’s business operations, financial information, and proprietary information as well as like information pertaining to individuals and entities that are not parties to this litigation. This information is not available within the public domain and was contemplated by the parties when they jointly drafted and entered into the confidentiality order entered by Your Honor on August 6, 2019. *See* Document No. 42.

Good cause exists for granting this request to file the above-referenced documents under seal so that it may include these documents in response to Roc Nation’s letter-motion (Document No. 97) seeking leave to file a motion to compel discovery.

Thank you for your time and attention to this matter.

Granted.
SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge

Respectfully submitted,

/s/George J. Vogrin
George J. Vogrin

April 2, 2020